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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SCOTT H. LAWRENCE and
DEBRA R. LAWRENCE

Defendants.

Case No. 2:21-cr-214-RFB-DJA

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the government during

1 discovery that contain the confidential taxpayer information or personal identifying information
2 of non-defendants referenced in the discovery. The parties state as follows:

3 1. The indictment in this case issued on August 3, 2021.

4 2. Trial is currently scheduled for October 18, 2021. Evan J. Davis is retained counsel
5 for defendant Scott H. Lawrence. George Kelesis is retained counsel for defendant Debra R.
6 Lawrence.

7 3. The indictment charges the defendants with conspiring to defraud the IRS from at
8 least 2005 through at least 2020, tax evasion, filing a false tax return, assisting in the filing of false
9 tax returns, and failing to file tax returns and pay federal income taxes. The discovery therefore
10 contains taxpayer information, including tax returns and information otherwise deemed
11 confidential under 26 U.S.C. § 6103. The discovery also contains the personal identifying
12 information, such as social security numbers and birthdates of individuals. The release of such
13 information to the public or third parties not involved in the case could endanger the privacy of
14 the defendant and individuals mentioned in the discovery and also subject them to potential
15 misuse of their identities. This confidential taxpayer and personal identifying information is
16 referred to here as the "Protected Information."

17 4. In order to protect the privacy of the individuals referenced in the discovery, the
18 parties intend to restrict access to the following individuals: attorneys for all parties, the parties,
19 and any personnel that the attorneys consider helpful or necessary to assist in performing that
20 attorney's duties in the prosecution or defense of this case, including investigators, paralegals,
21 retained experts, consultants, support staff, interpreters, and any other individuals specifically
22 authorized by the Court (collectively, the "Covered Individuals").

23 5. The Covered Individuals shall be advised of the Protective Order, and, without
24 leave of Court, the Covered Individuals shall not:

- a. make copies for, or allow copies of any kind to be made by any other person of the Protected Information in this case;
- b. allow any other person to read, listen, or otherwise review the Protected Information in this case;
- c. use the Protected Information for any purpose other than preparing to defend against or prosecute the charges in the Indictment or any further superseding indictment arising out of this case; or
- d. attach any Protected Information to any of the pleadings, briefs, or other court filings except to the extent those pleadings, briefs, or filings are filed under seal or properly compliant with LR IC 6-1.

6. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Information as evidence at trial or support in motion practice.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. The parties reserve the right to seek to modify the terms of this protective order at a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need for this protective order cease to exist, on grounds other than a Covered Individual or some other person violating or circumventing its terms, the government will move expeditiously for its dissolution.

9. The defense hereby stipulates to this protective order.

DATED: September 3, 2021

Respectfully submitted,

For the United States:

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Acting United States Attorney

SIMON F. KUNG
Assistant United States Attorney

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